

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

GREEN COPPER HOLDINGS, LLC)
EIN # xx-xxx9708)

CASE NO. 25-10088-T
Chapter 7

COPPER TREE, INC.)
EIN # xx-xxx6608)

Substantively Consolidated

THE INN AT PRICE TOWER INC.)
Debtors.)

/

**DECLARATION OF KENNITH GREENBERG IN SUPPORT
OF CLAIMS FOR PICTORIA STUDIOS AND TAKTIK ENTERPRISES**

COMES NOW Kennth Greenberg, who deposes and declares under penalties of perjury the following Declaration is support of Claims for Pictoria Studios USA, Inc., (Claimant No. 14), and Taktik Enterprises, Inc., (Claimant No. 4), and says:

1. My name is Kennith Greenberg. I am over the age of 18 and competent to make this affidavit. I have personal knowledge of the facts stated herein.
2. My business address is: 1635 White Dove Dr, Winter Springs, FL 32708
3. I have extensive experience in banking and hospitality. I served as Vice President at IndyMac Bank (2006-2007), President of US Hospitality Group, LLC, and Vice President at Westgate Resorts/Central Florida Investments, Inc. (2007-2008). I currently work as a consultant and broker in real estate and financing through entities like GreenGold Consulting Corp.
4. I have previously worked with the team at Pictoria Studios USA, including Michael Moran, and Dale Takio of Taktik Enterprises, on startup and development projects. Michael Moran is one of

the best startup marketing professionals I have ever worked with. His "Swiss Army knife" array of skills—including knowledge of business planning, technology, IT, marketing, digital marketing, and extensive experience—make him one of the top key people for startup projects in the country.

5. I was introduced to the Price Tower project in Bartlesville, Oklahoma, in June 2023. I officially signed a letter of understanding as a broker to help solicit loans and other financial vehicles for the project owned by Copper Tree Inc. and Green Copper Holdings LLC. This project was the Price Tower ("Project").

6. From June 2023 until approximately December 2023, I worked closely with Michael Moran and Dale Takio on an almost daily basis for the Project. This included acquiring due diligence documents, preparing presentation decks, and engaging potential financing partners for the Price Tower renovations and operations.

7. After the end of Moran and Takio's contracts with Copper Tree on or around November 2023, I continued to work directly with Copper Tree through my own company, GreenGold Consulting Corp. Part of my job was assisting Cynthia Blanchard with liquidating certain assets, such as artwork, updating appraisals, and identifying buyers for certain assets.

8. I witnessed throughout my services with Copper Tree, Mrs. Blanchard attempting to or actually moving out many of the artifacts and artwork belonging to the Project for what I was told was to obtain "money to pay the bills". While I don't recall specifics, I know that Cynthia Blanchard sold off several art pieces belonging to the project.

9. At times, Mrs. Blanchard told me that the Project and herself were needing money, so she asked me on several instances to broker as much of the Project's artifacts and artwork that I could and she would pay me a approximately 15% commission for anything sold.

10. I introduced Mrs. Cynthia Blanchard to multiple people who were interested in purchasing the Project's art and artifacts, however, when I inquired whether anything was sold, she would not say and simply ignored the question.

11. I spoke with Cynthia Blanchard, CEO of Copper Tree, numerous times about Pictoria Studio's and Taktik Enterprises' performances. She expressed great appreciation for their work, including but not limited to marketing strategies, guest experience planning, computer support, IP work, marketing and advertising, business planning and strategies, high level third party meetings, and financing support. She also expressed remorse that she was not able to pay them, as she was aware they had funded much of the work done for Copper Tree out of their own pocket including incurring costs and fees.

12. Mrs. Blanchard stated on numerous occasions that had it not been for the incredible help and hard work of Dale Takio and Michael Moran, she would not have gotten the Price Tower and all that went with it.

13. Based on my experience, the services provided by Michael Moran through Pictoria Studios and Dale Takio through Taktik Enterprises were substantial, valuable, and aligned with industry standards for startup hospitality and real estate projects.

[SIGNATURE ON FOLLOWING PAGE]

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on August 14, 2025.

Ken Greenberg
Ken Greenberg (Aug 14, 2025 15:17:14 EDT)
KENNETH GREENBERG

Dated: August 14, 2025

Respectfully Submitted by:

/s/ Craig Alan Brand, Esq.

Craig A. Brand

Craig Alan Brand, Esq.

Florida Bar No. (FBN): 896111

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Attorney for: TAKTIK ENTERPRISES, INC., AND, PICTORIA STUDIOS USA, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 14, 2025, a true and correct copy of the foregoing Affidavit or Kenneth Greenberg was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Craig Alan Brand, Esq.

Craig A. Brand

Craig Alan Brand, Esq.

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